
**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

**STANDFORD ODURO,
a/k/a "Kojo,"**

and

**KWAME MANU,
a/k/a "Paul Brown"**

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CRIMINAL COMPLAINT

Magistrate No. 19- 4002

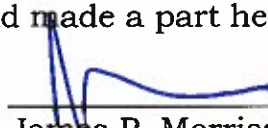
I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the United States Department of Homeland Security, Immigration and Customs Enforcement, and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached pages and made a part hereof.



James P. Morrissey
U.S. Department of Homeland Security
Immigration and Customs Enforcement

Sworn to before me and subscribed in my presence,

January 14, 2019

Date

at Newark, New Jersey

City and State



Honorable Michael A. Hammer
United States Magistrate Judge

ATTACHMENT A

Count 1
(Transportation of Stolen Vehicles
Against Defendant ODURO)

From at least as early as in or about February 2018, and continuing through at least December 2018, in Essex County, in the District of New Jersey, and elsewhere, defendant

STANDFORD ODURO,
a/k/a "Kojo,"

did unlawfully transport and cause to be transported in interstate and foreign commerce one or more motor vehicles, knowing the same to have been stolen.

In violation of Title 18, United States Code, Section 2312 and Section 2.

Count 2
(Transportation of Stolen Vehicles
Against Defendant MANU)

From at least as early as in or about February 2018, and continuing through at least December 2018, in Essex County, in the District of New Jersey, and elsewhere, defendant

KWAME MANU,
a/k/a "Paul Brown,"

did unlawfully transport and cause to be transported in interstate and foreign commerce one or more motor vehicles, knowing the same to have been stolen.

In violation of Title 18, United States Code, Section 2312 and Section 2.

Count 3
(Sale and Receipt of Stolen Vehicles
Against Defendant ODURO)

From at least as early as in or about February 2018, and continuing through at least December 2018, in Essex County, in the District of New Jersey, and elsewhere, defendant

STANDFORD ODURO,
a/k/a "Kojo,"

did receive, possess, conceal, store, barter, sell, and dispose of one or more motor vehicles, which had crossed a State and United States boundary after being stolen, knowing the same to have been stolen.

In violation of Title 18, United States Code, Section 2313 and Section 2.

Count 4
(Sale and Receipt of Stolen Vehicles
Against Defendant MANU)

From at least as early as in or about February 2018, and continuing through at least December 2018, in Essex County, in the District of New Jersey, and elsewhere, defendant

KWAME MANU,
a/k/a "Paul Brown,"

did receive, possess, conceal, store, barter, sell, and dispose of one or more motor vehicles, which had crossed a State and United States boundary after being stolen, knowing the same to have been stolen.

In violation of Title 18, United States Code, Section 2313 and Section 2.

Count 5
**(Conspiracy to Transport Stolen Vehicles and
to Sell and Receive Stolen Vehicles Against Both Defendants)**

From at least as early as in or about February 2018, and continuing through at least December 2018, in Essex County, in the District of New Jersey, and elsewhere, defendants

STANDFORD ODURO,
a/k/a "Kojo,"

and

KWAME MANU,
a/k/a "Paul Brown,"

did conspire (i) to transport in interstate and foreign commerce one or more motor vehicles, knowing the same to have been stolen, and (ii) to receive, possess, conceal, store, barter, sell, and dispose of one or more motor vehicles, which had crossed a State and United States boundary after being stolen, knowing the same to have been stolen, contrary to Title 18, United States Code, Sections 2312 and 2313.

In violation of Title 18, United States Code, Section 371.

ATTACHMENT B

I, James P. Morrissey, am a Special Agent with the United States Department of Homeland Security, Immigration and Customs Enforcement, assigned to the Newark Field Office. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation.

OBJECT AND OVERVIEW OF THE CONSPIRACY

1. The investigation has revealed that numerous stolen vehicles have been illegally exported, or attempted to be exported, from the seaport located in Newark, New Jersey (hereinafter, the "Port of Newark"), to various destinations overseas, including Ghana. These vehicles were either stolen or carjacked in various states, including New Jersey. The overseas market for stolen and carjacked vehicles is growing because customers can purchase those vehicles at a cost significantly lower than the fair market value of the vehicles.

2. To fill this growing demand, defendants Stanford Oduro, a/k/a "Kojo" (hereinafter, "defendant ODURO") and Kwame Manu, a/k/a "Paul Brown" (hereinafter, "defendant MANU") joined a criminal organization that involves the theft, carjacking, sale, receipt, transportation, interstate trafficking, and illegal exportation of stolen and carjacked motor vehicles. This organization is wide and extensive and generally operates in multiple layers, as described herein.

a. One layer of the auto-theft exportation organization includes the individuals who steal motor vehicles. In some instances, the motor vehicles are carjacked. The theft and carjacking of vehicles is usually done by individuals who are gang members or otherwise affiliated with a gang.

b. A second layer of the auto-theft exportation organization involves individuals who sell and purchase stolen or carjacked vehicles. Such individuals, known as "fences," typically purchase the stolen vehicles for just a few thousand dollars each, even if the vehicles are brand-new luxury automobiles worth tens of thousands of dollars. Because they deal directly with gang members and other dangerous individuals who make their living by stealing and carjacking vehicles, fences often keep firearms in their homes and places of business. After purchasing a stolen or carjacked vehicle, a fence typically employs individuals known as "runners" to transport the vehicles and related paperwork and payments from one location to another. Based on my

personal knowledge and experience, such paperwork typically includes a counterfeit Certificate of Title for each vehicle, *i.e.*, a document purportedly issued by a state, describing the vehicle by year, make, model, color, and Vehicle Identification Number (“VIN”), and setting forth the purported name and address of the owner and/or lienholder (financial institution that loaned money to buy the car). The counterfeit Certificates of Title used by this auto-theft organization often describe motor vehicles different in year, make, model, and/or color from the vehicles actually shipped under those Certificates of Title, and the VINs listed on the counterfeit Certificates of Title differ from those of the vehicles actually shipped under those Certificates of Title.

c. After the fence has obtained a counterfeit Certificate of Title for a stolen or carjacked vehicle, the third layer of the criminal activity involves the sale of the vehicle to a customer. The “customers” in this case are either individuals who purchase the vehicles for their personal use in the United States or overseas, or individuals who ship stolen and carjacked vehicles from the United States to other countries to resell them to end users. In some instances, the customers place orders, that is, they tell fences that they are looking to buy specific vehicles. In other instances, individuals who steal or carjack vehicles contact fences and let them know the type of vehicles available for sale.

d. A fourth layer of criminal activity involves individuals who coordinate the exportation of stolen vehicles overseas. Vehicles are shipped abroad through a Non-Vessel Operating Common Carrier (“NVOCC”). An NVOCC is a company licensed by the Federal Maritime Commission (“FMC”) that is bonded and insured for purposes of exporting goods in foreign commerce. Individual persons or entities who are not licensed with the FMC obtain the services of NVOCCs to ship goods overseas. The NVOCC leases containers and guarantees space on vessels being operated by major shipping carriers who will only do business with entities who are bonded and insured. The NVOCC does not take physical custody of the goods or containers. Instead, they process documents required by Customs and by the shipping carriers who actually ship the goods in foreign commerce, such as a Shipper’s Export Declaration, bill of lading, and dock receipts. Because NVOCCs require documentation from persons shipping vehicles, customers typically use a middle person to conduct the transaction in an attempt to insulate themselves. Alternatively, customers present fraudulent documentation to conceal the true information about the vehicles being transported overseas, such as altered Certificates of Title.

OVERVIEW OF THE DEFENDANTS

3. Defendant ODURO is a fence who buys stolen and/or carjacked vehicles from gang members and others, obtains counterfeit Certificates of Title to make those vehicles appear legitimate for purposes of export and sale, and

facilitates the exportation of the vehicles from the Port of Newark to various overseas destinations, including Ghana.

4. Defendant MANU is an associate of defendant ODURO who coordinates the shipment of stolen and carjacked vehicles to customers overseas. Using the alias "Paul Brown," defendant MANU contracts with NVOCCs to purchase space on vessels for the export of stolen and carjacked vehicles on behalf of ODURO. In return, defendant ODURO pays defendant MANU a fee, in cash, for each vehicle shipped.

THE CRIMINAL CONDUCT

The July 2018 Shipment

5. On or about April 18, 2018, a vehicle owner reported to law enforcement that his 2017 Range Rover bearing a VIN ending in 67888 (hereinafter, "RANGE ROVER 1") had been stolen from the driveway of his residence in Long Branch, New Jersey.

6. On or about April 23, 2018, the user of a WhatsApp account associated with defendant ODURO's business, D and J Trucking, sent a series of photographs to a WhatsApp account linked to defendant MANU's mobile telephone number. One of those photographs showed a shipping container bearing a tracking number ending in 7018 (hereinafter, the "CONTAINER PHOTOGRAPH"). Another depicted a Certificate of Title for a Mercedes-Benz vehicle with a VIN ending in 32787 (hereinafter, the "TITLE PHOTOGRAPH"). These photographs were unaccompanied by any text.

7. On or about April 27, 2018, a car dealership in Monroe County, Pennsylvania reported to law enforcement that three vehicles had been stolen from its lot, including a 2018 Honda CR-V bearing a VIN ending in 28503 (hereinafter, "the HONDA").

8. On or about May 29, 2018, defendant MANU informed law enforcement that a stolen Range Rover was parked in the backyard of a property in East Orange, New Jersey, near defendant ODURO's residence and at defendant ODURO's direction. On or about the same date, law enforcement agents used aerial surveillance to confirm the presence at that location of a Range Rover with a Pennsylvania dealer license plate matching that of RANGE ROVER 1.

9. On or about July 17, 2018, law enforcement discovered RANGE ROVER 1 and the HONDA in a shipping container with a tracking number ending in 7018 – the same container shown in the CONTAINER PHOTOGRAPH – which was about to leave New York City en route to Ghana. The shipping records for the container stated that it held a Mercedes-Benz with a VIN ending

in 32787 – the same VIN shown in the TITLE PHOTOGRAPH – but there was no such vehicle in the container. The shipping records identified the sender of the container as “Paul Brown” and identified the particular NVOCC that had booked the cargo space for the container (hereinafter, the “Shipper”).

10. On or about August 31, 2018, defendant ODURO admitted to law enforcement that he had arranged to park a Range Rover in the backyard of his neighbor’s home in East Orange, New Jersey, on or about May 29, 2018 – the same date on which RANGE ROVER 1 was observed and photographed in that location by law enforcement. Defendant ODURO also admitted at that time that defendant MANU has an account with the Shipper under the name “Paul Brown.”

11. On or about September 12, 2018, Defendant MANU admitted to law enforcement that:

a. he uses the name “Paul Brown,” at ODURO’s direction, to contract with the Shipper for transportation of stolen vehicles from the United States to foreign destinations on behalf of defendant ODURO;

b. defendant MANU has himself made at least one payment to the Shipper on defendant ODURO’s behalf; and

c. defendant ODURO pays defendant MANU between \$200 and \$400 in cash each time a “Paul Brown” shipment sent by defendant MANU is successfully delivered to an overseas customer.

The August 2018 Shipment

12. On or about May 19, 2018, a vehicle owner in Deal, New Jersey reported to law enforcement that his 2018 Range Rover Sport bearing a VIN ending in 84307 (hereinafter, “RANGE ROVER 2”) had been stolen from the driveway of his residence.

13. On or about June 20, 2018, a vehicle owner in Middletown, New Jersey reported to law enforcement that his 2018 Audi A3 bearing a VIN ending in 01301 (hereinafter, the “AUDI”), had been stolen.

14. On or about August 7, 2018, law enforcement interdicted a shipping container en route to Africa, sent by “Paul Brown,” which was found to contain RANGE ROVER 2 and the AUDI.

15. On or about August 16, 2018, Confidential Source Number 1 (“CS1”), an individual involved in the illegal export of stolen vehicles, made a lawfully recorded call to defendant MANU’s mobile telephone. During that recorded telephone call, defendant MANU identified himself as “Paul Brown,”

stated that he was in Ghana, and requested the container number and booking number for a shipment already en route to Ghana. In response, CS1 provided defendant MANU with the container and booking numbers of the shipment containing RANGE ROVER 2 and the AUDI, which had, unbeknownst to defendant MANU, already been interdicted by law enforcement. Defendant MANU then promised CS1 that he would promptly pay \$2,050 in outstanding shipping fees due to CS1 for that shipment.

16. On or about August 28, 2018, CS1 again made a lawfully recorded telephone call to defendant MANU's mobile telephone. During that recorded telephone call, defendant MANU, still identifying himself as "Paul Brown," again promised to pay the outstanding shipping fees for the container holding RANGE ROVER 2 and the AUDI, which defendant MANU still did not know had been interdicted by law enforcement.

17. On or about August 31, 2018, defendant ODURO admitted to law enforcement that his business, D&J Trucking, is registered in the name of "Paul Brown" and that "Paul Brown" is actually defendant MANU.

18. On or about September 12, 2018, defendant MANU admitted to law enforcement that, on or about August 29, 2018, while defendant MANU was in Ghana, defendant ODURO contacted him to say that one of the two stolen vehicles en route to Ghana was a "Range" intended for defendant MANU.

19. On or about October 30, 2018, Confidential Source Number 2 (hereinafter, "CS2") admitted to law enforcement that defendant ODURO had given him the shipping documents for the container subsequently interdicted by law enforcement and found to contain RANGE ROVER 2 and the AUDI, and that he, CS2, had delivered those documents to the Shipper. In the same interview, CS2 also admitted to law enforcement that he had delivered a \$2,000 payment to the Shipper at the request of defendant ODURO.



James P. Morrissey, Special Agent
U.S. Dept. of Homeland Security
Immigration and Customs Enforcement

Sworn to and subscribed before me
this 14th day of January, 2019



Honorable Michael A. Hammer
United States Magistrate Judge